

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 3:18-cr-185
)	
CHRISTOPHER WILLS,)	
)	
Defendant.)	

COUNSEL’S NOTICE IN RESPONSE TO ORDER

Gerald Thomas Zerkin, former counsel for Defendant, Christopher Wills, states, in response to the Court’s Order of February 13, 2024 (ECF # 191), that he has a conflict of interest due to the fact that Defendant previously filed a claim of ineffective assistance of counsel against counsel, in connection with which counsel was required to both file an Affidavit and testify.

s/Gerald Thomas Zerkin
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CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of February, 2024, I filed the foregoing with the ECF system, which will send a copy thereof to counsel of record.

s/ Gerald Thomas Zerkin
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